

1 CLARK HILL PLLC
 2 PAOLA M. ARMENI
 3 Nevada Bar No. 8357
 Email: parmeni@clarkhill.com
 4 GIA N. MARINA
 Nevada Bar No. 15276
 Email: gmarina@clarkhill.com
 5 1700 South Pavilion Center Drive, Suite 500
 Las Vegas, Nevada 89135
 Tel: (702) 862-8300

6 Attorneys for Defendant, Michele Fiore

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

CASE NO. 2:24-cr-00155-JAD-DJA

10 Plaintiff,

11 vs.

12 MICHELE FIORE,

**STIPULATION AND ORDER TO
 CONTINUE SENTENCING (THIRD
 REQUEST)**

13 Defendant.

14

15 **IT IS HEREBY STIPULATED** by and between Defendant, Michele Fiore, by and
 16 through her counsel, Paola M. Armeni, Esq. and Gia N. Marina of the law firm of Clark Hill PLLC
 17 and the Plaintiff, United States of America, by and through Sue Fahami Acting United States
 18 Attorney, Alexander Byrne Gottfried, and Dahoud Askar, that the currently scheduled sentencing
 19 hearing set for April 14, 2025, at 1:30 p.m., be vacated and continued to May 14, 2025, at 10:00
 20 a.m., or to a date thereafter that is convenient for the Court.

21 This Stipulation is entered into for the following reasons:

- 22
1. Lead counsel, Paola M. Armeni, Esq., started trial on March 24, 2025, in the case captioned
United States of America v. Eduardo Ruben Lopez, Case No. 2:23-CR-00055-CDS-DJA. This trial
 23 is expected to last three-weeks, through April 11, 2025.
 2. The current deadline to file Ms. Fiore's Sentencing Memorandum and Objections to the
 24 Presentence Investigation Report is April 9, 2025. Counsel for Ms. Fiore will still be in the above-
 25 referenced trial on this date.

26

1 3. The request to continue is so that counsel for Ms. Fiore has adequate time to prepare
2 sentencing documents and prepare for sentencing in order to effectively represent her client.

3 4. Ms. Fiore has appeared in this case, and is in not custody and, along with the government,
4 agrees to this continuance.

5 5. The additional time requested herein is not sought for purposes of delay and the denial of
6 this request for a continuance could result in a miscarriage of justice.

7 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
8 hearing for good cause. Good cause exists in this case.

9 7. For all the above-stated reasons, the ends of justice would be best served by a continuance
10 of the sentencing hearing.

11 8. This is the third request for a continuance of the sentencing hearing.

12 Matthew Galeotti,
13 Supervisory Official,
14 Criminal Division
15 U.S. Department of Justice

CLARK HILL PLLC

16 DATED this 1st day of April, 2025.

DATED this 28th day of March, 2025.

17 _____
18 /s/ Alexandre B. Gottfried
19 ALEXANDER BYRNE GOTTFRIED
20 DAHOUD ASKAR
21 Attorney for Plaintiff,
22 UNITED STATES OF AMERICA

/s/ Paola M. Armeni
PAOLA M. ARMENI
GIA N. MARINA
Attorneys for Defendant,
MICHELE FIORE

23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MICHELE FIORE,

Defendant.

CASE NO. 2:24-cr-00155-JAD-DJA

FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

CONCLUSIONS OF LAW

Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. Lead counsel, Paola M. Armeni, Esq., started trial on March 24, 2025, in the case captioned *United States of America v. Eduardo Ruben Lopez*, Case No. 2:23-CR-00055-CDS-DJA. This trial is expected to last three-weeks, through April 11, 2025.

2. The current deadline to file Ms. Fiore's sentencing memorandum and objections to the Presentence Investigation Report is April 9, 2025. Counsel for Ms. Fiore will still be in the above-referenced trial on this date.

3. The request to continue is so that counsel for Ms. Fiore has adequate time to prepare sentencing documents and prepare for sentencing in order to effectively represent her client.

4. Ms. Fiore has appeared in this case, and is in not custody and, along with the government, agrees to this continuance.

5. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.

6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

7. For all the above-stated reasons, the ends of justice would be best served by a continuance of the sentencing hearing.

3 8. This is the third request for a continuance of the sentencing hearing.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing in this matter scheduled for April 14, 2025, at the hour of 1:30 p.m. is hereby vacated and continued to the 14th day of May, 2025, at the hour of _____ m., in Courtroom 6D.

DATED this _____ day of _____, 2025.

**JENNIFER A. DORSEY
UNITED STATES DISTRICT COURT JUDGE
CASE NO.: 2:24-cr-00155-JAD-DJA**